

### REMARKS

Favorable reconsideration of this application is respectfully requested.

Claims 1-9, 13-16 and 18-27 are present in this application, claims 10 and 11 being canceled and claims 25-27 being added by way of the present amendment. Claims 3-9 are withdrawn. Amended claim 1 and new claims 25-27 are supported by Fig. 1 and page 9 of the present specification. No new matter is believed to be added.

Claims 21 and 22 are amended are suggested in the Office Action, in response to the objection to the claims.

Claims 1, 2, 13-16 and 18 are rejected under 35 U.S.C. § 102(b) over U.S. 6,400,471 (Kuo et al.).

The image processing apparatus of claim 1 includes a buffer memory for data storage consisting of a separately structured local memory. This is illustrated for example as local buffers 9 and 10, which are separately structured and are not part of any larger or combined memory structure or architecture. The operation of the apparatus can be made more efficient and faster, since data is not transferred between the image processing unit and a buffer memory part of a larger memory structure.

Turning to the § 102(b) rejection, Kuo et al. discloses in Figure 11 an architecture having a line reader 620, DSP 922, JPEG hardware 924 and line writer 650. The architecture also includes a memory structure having a plurality of buffers 1110, 1120, 1130, and 1140. Data is transferred between the buffers in the memory structure and elements 620, 922, 924 and 650. The architecture taught by Kuo et al. clearly consists of a memory structure having a plurality of buffers, connected to transfer data between the plurality of buffers and the various elements. There is clearly no buffer memory consisting of a separately structure local memory connected to receive only image data from an image processing unit and to output image data only to the compression unit. Accordingly, the image processing apparatus of

claim 1 is neither taught nor disclosed by Kuo et al., and is further teaching one skilled in the art away from a buffer memory storage consisting of a separately structured local memory.

There is also no buffer memories each consisting of a separately structure local memory connected to receive only image data from an image processing unit and to output image data only to the compression unit, as recited in claim 15, in Kuo et al.

It is respectfully submitted the present application is in condition for allowance, and a favorable action to that effect is respectfully requested.

Respectfully submitted,

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